

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: Chapter 11
CarePoint Health Systems Inc. d/b/a Just Health : Case No. 24-12534 (JKS)
Foundation, et al.,¹ : (Jointly Administered)
Debtors. :
----- v

AMENDED² NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR
HEARING ON
DECEMBER 16, 2024 AT 9:30 A.M. (ET)³

This proceeding will be conducted **in-person**.
All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.
Please refer to Judge Stickles' Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate
remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of
remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the
hearing unless otherwise noticed using the [eCourtAppearances](http://www.deb.uscourts.gov/ecourt-appearances) tool available on the Court's
website.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² Amendments are highlighted in **Bold**.

³ All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

I. MATTERS UNDER CNO

1. Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Debtors' Prepetition Management Services Agreement with Insight, (II) Approving Stipulation Between Debtors and Insight, and (III) Granting Related Relief [Filed: 12/01/2024; D.I. [211](#)].

Related Documents:

- A. Certification of No Objection Regarding Motion of the Debtors to Reject Prepetition Management Services Agreement with Insight [Filed: 12/11/2024; D.I. [280](#)].
- B. **Order Approving Stipulation Between the Debtors and Insight Management and Consulting Services, Inc. Authorizing the Rejection of the Insight Management and Services Agreement [Filed: 12/13/2024; D.I. [291](#)].**

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET).

Objections Received: None.

Status: **The Order has been entered. This matter will not go forward.**

II. MATTERS UNDER COC

2. Application of the Debtors for Authority to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor [Filed: 11/18/2024; D.I. [144](#)].

Related Documents:

- A. Certificate of No Objection Regarding Application of the Debtors for Authority to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor [Filed: 12/05/2024; D.I. [228](#)].
- B. Exhibit Regarding Schedule 1 – Potential Parties in Interest; and Schedule 2 – Client Match List [Filed: 12/11/2024; D.I. [276](#)].
- C. Certification of Counsel Regarding Application of the Debtors for Authority to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor [Filed: 12/11/2024; D.I. [281](#)].

- D. **Order Authorizing the Debtors to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor [Filed: 12/13/2024; D.I. [288](#)].**

Objection Deadline: December 2, 2024 at 4:00 p.m. (ET).

Objections Received: None.

Status: **The Order has been entered. This matter will not go forward.**

3. Debtors' Motion to Pay Certain Prepetition Physician Compensation and Expenses [Filed: 11/21/2024; D.I. [169](#)].

Related Documents:

- A. Motion to Shorten Notice and Schedule Expedited Hearing with Respect to Debtors' Motion to Pay Certain Prepetition Physician Compensation and Expense Reimbursement [Filed: 11/21/2024; D.I. [170](#)].
- B. Order Granting Motion to Shorten Notice and Schedule Expedited Hearing With Respect to Interim Relief Sought in Debtors' Motion to Pay Remaining Prepetition Physician Compensation [Filed: 11/22/2024; D.I. [181](#)].
- C. Interim Order Authorizing Debtors to Pay Certain Prepetition Physician Compensation and Expenses [Filed: 11/26/2024; D.I. [203](#)].
- D. Certification of Counsel Regarding Final Order Authorizing Debtors to Pay Certain Prepetition Physician Compensation and Expenses [Filed: 12/11/2024; D.I. [282](#)].
- E. **Final Order Authorizing Debtors to Pay Certain Prepetition Physician Compensation and Expenses [Filed: 12/13/2024; D.I. [292](#)].**

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET).

Objections Received: None.

Status: **The Final Order has been entered. This matter will not go forward.**

III. MATTERS GOING FORWARD

4. Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral [Filed 11/03/2024; D.I. [10](#)].

Related Documents:

- A. Certification of Counsel Regarding Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [86](#)].
- B. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [87](#)].
- C. Certification of Counsel Regarding Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [118](#)].
- D. Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [119](#)].
- E. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- F. Proposed Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)].
- G. Certification of Counsel [Filed: 12/10/2024; D.I. [274](#)].

- H. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [275](#)].

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 20, 2024 [D.I. [272](#)].

Responses:

- I. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024; D.I. [71](#)].
- J. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- K. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)].
- L. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)].
- M. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)].

Additional Related Documents:

- N. **Proposed Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis** [Filed: 12/13/2024; D.I. [293](#)].

Status: This matter is going forward for the limited purposes of (1) consideration of issues raised by the Official Committee of Unsecured Creditors with respect to the composition of the Debtors' board and (2) entry of an interim order authorizing further interim financing through the hearing on January 7, 2025 at 9:30. All other issues regarding the merits of the Motion will be heard on January 7, 2025 at 9:30.

5. Motion of IJGG Opco, LLC and IJGG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJGG Opco, LLC and IJGG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed 11/03/2024, D.I. [11](#)].

Related Documents:

- A. Amendment to Motion of IJGG Opco, LLC and IJGG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJGG Opco, LLC and IJGG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 11/06/2024, D.I. [68](#)].
- B. Certification of Counsel Regarding Interim Order Authorizing Debtors to Postpetition Financing [Filed 11/07/2024, D.I. [86](#)]. (See 4A)
- C. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024, D.I. [87](#)]. (See 4B)
- D. Certification of Counsel Regarding Interim Order (A) Authorizing IJGG Opco, LLC and IJGG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [127](#)].
- E. Interim Order (A) Authorizing IJGG Opco, LLC and IJGG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [128](#)].
- F. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See 4E)
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)]. (See 4F)

- H. Certification of Counsel [Filed: 12/10/2024; D.I. [274](#)]. (See 4G)
- I. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [275](#)]. (See 4H)

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 20, 2024 [D.I. [272](#)].

Responses:

- J. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See 4I)
- K. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- L. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)]. (See 4J)
- M. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)]. (See 4K)
- N. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)]. (See 4L)
- O. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)]. (See 4M)

Additional Related Documents:

- P. **Proposed Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis** [Filed: 12/13/2024; D.I. [293](#)]. [See 4N]

Status: This matter is going forward for the limited purposes of (1) consideration of issues raised by the Official Committee of Unsecured Creditors with respect to the composition of the Debtors' board and (2) entry of an interim order authorizing further interim financing through the hearing on January 7, 2025 at 9:30. All other issues regarding the merits of the Motion will be heard on January 7, 2025 at 9:30.

IV. MATTERS BEING CONTINUED

6. Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow *Inter Alia*, Interim Hospital Operations, (B) A Final Order Approving A Private Sale of All Or Substantially All Assets of IJKG Opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 11/04/2024, D.I. [18](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 20, 2024 [D.I. [272](#)].

Responses:

- B. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)].
- C. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- D. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].

Status: This matter has been continued to January 7, 2025 at 9:30 a.m. (ET).

7. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 11/04/2024, D.I. [19](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 20, 2024 [D.I. [272](#)].

Responses:

- B. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024; D.I. [71](#)].
- C. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- D. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].

Status: This matter has been continued to January 7, 2025 at 9:30 a.m. (ET).

8. Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/01/2024; D.I. [212](#)].

Related Documents: None.

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 20, 2024 [D.I. [272](#)].

Objections Received: None.

Status: This matter has been continued to January 7, 2024 at 9:30 a.m. (ET).

9. Motion of the Debtors for the Entry of an Order (I) Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 11/19/2024; D.I. [160](#)].

Related Documents:

- A. Amended Schedule I – Non-Exclusive List of Ordinary Course Professionals [Filed: 12/05/2024; D.I. [225](#)].
- B. Revised Form of Declaration [Filed: 12/05/2024; D.I. [239](#)]
- C. Certification of Counsel Regarding Order Authorizing (I) The Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 12/09/2024; D.I. [263](#)].

Objection Deadline: December 3, 2024 at 4:00 p.m. (ET). The objection deadline has been extended to December 5, 2024 at 4:00 p.m. for the U.S. Trustee and Official Creditors Committee only.

Objections Received:

- D. Objection of U.S. Trustee to Debtor's Motion for Entry of an Order (I) Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 12/04/2024; D.I. [220](#)].

Status: The Debtors are in communication with certain ordinary course professionals. This matter is being continued to January 7, 2024 at 9:30 a.m. (ET).

Dated: December 13, 2024

DILWORTH PAXSON LLP

/s/ Peter C. Hughes

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